

**STATISTICAL INFORMATION ONLY: Debtor must select the number of each of the following items included in the Plan.**

## 0 Valuation of Security 0 Assumption of Executory Contract or Unexpired Lease 0 Lien Avoidance

Last revised: August 1, 2020

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In Re:

Case No.: 18-17590

NANCY M. KRIMM

Judge: ABA

**Debtor(s)**

## Chapter 13 Plan and Motions

Original       Modified/Notice Required      Date: December 1, 2021  
 Motions Included       Modified/No Notice Required

THE DEBTOR HAS FILED FOR RELIEF UNDER  
CHAPTER 13 OF THE BANKRUPTCY CODE

**YOUR RIGHTS MAY BE AFFECTED**

You should have received from the court a separate *Notice of the Hearing on Confirmation of Plan*, which contains the date of the confirmation hearing on the Plan proposed by the Debtor. This document is the actual Plan proposed by the Debtor to adjust debts. You should read these papers carefully and discuss them with your attorney. Anyone who wishes to oppose any provision of this Plan or any motion included in it must file a written objection within the time frame stated in the *Notice*. Your rights may be affected by this plan. Your claim may be reduced, modified, or eliminated. This Plan may be confirmed and become binding, and included motions may be granted without further notice or hearing, unless written objection is filed before the deadline stated in the *Notice*. The Court may confirm this plan, if there are no timely filed objections, without further notice. See Bankruptcy Rule 3015. If this plan includes motions to avoid or modify a lien, the lien avoidance or modification may take place solely within the chapter 13 confirmation process. The plan confirmation order alone will avoid or modify the lien. The debtor need not file a separate motion or adversary proceeding to avoid or modify a lien based on value of the collateral or to reduce the interest rate. An affected lien creditor who wishes to contest said treatment must file a timely objection and appear at the confirmation hearing to prosecute same.

The following matters may be of particular importance. Debtors must check one box on each line to state whether the plan includes each of the following items. If an item is checked as "Does Not" or if both boxes are checked, the provision will be ineffective if set out later in the plan.

## THIS PLAN:

DOES  DOES NOT CONTAIN NON-STANDARD PROVISIONS. NON-STANDARD PROVISIONS MUST ALSO BE SET FORTH IN PART 10.

DOES  DOES NOT LIMIT THE AMOUNT OF A SECURED CLAIM BASED SOLELY ON VALUE OF COLLATERAL, WHICH MAY RESULT IN A PARTIAL PAYMENT OR NO PAYMENT AT ALL TO THE SECURED CREDITOR. SEE MOTIONS SET FORTH IN PART 7, IF ANY.

DOES  DOES NOT AVOID A JUDICIAL LIEN OR NONPOSSESSORY, NONPURCHASE-MONEY SECURITY INTEREST. SEE MOTIONS SET FORTH IN PART 7, IF ANY.

Initial Debtor(s)' Attorney: RSH Initial Debtor: NMK Initial Co-Debtor: \_\_\_\_\_

**Part 1: Payment and Length of Plan**

a. The debtor shall pay \$ 526.00 per month to the Chapter 13 Trustee, starting on December 1, 2021 for approximately 4 remaining months.

b. The debtor shall make plan payments to the Trustee from the following sources:

Future earnings

Other sources of funding (describe source, amount and date when funds are available):

c. Use of real property to satisfy plan obligations:

Sale of real property

Description:

Proposed date for completion: \_\_\_\_\_

Refinance of real property:

Description:

Proposed date for completion: \_\_\_\_\_

Loan modification with respect to mortgage encumbering property:

Description:

Proposed date for completion: \_\_\_\_\_

d.  The regular monthly mortgage payment will continue pending the sale, refinance or loan modification.

e.  Other information that may be important relating to the payment and length of plan:

**Part 2: Adequate Protection  NONE**

a. Adequate protection payments will be made in the amount of \$ \_\_\_\_\_ to be paid to the Chapter 13 Trustee and disbursed pre-confirmation to \_\_\_\_\_ (creditor).

b. Adequate protection payments will be made in the amount of \$ \_\_\_\_\_ to be paid directly by the debtor(s) outside the Plan, pre-confirmation to: \_\_\_\_\_ (creditor).

### Part 3: Priority Claims (Including Administrative Expenses)

a. All allowed priority claims will be paid in full unless the creditor agrees otherwise:

Creditor	Type of Priority	Amount to be Paid
CHAPTER 13 STANDING TRUSTEE	ADMINISTRATIVE	AS ALLOWED BY STATUTE
ATTORNEY FEE BALANCE	ADMINISTRATIVE	BALANCE DUE: \$ 2,685.00
DOMESTIC SUPPORT OBLIGATION		
Supplemental Attorney Fee (pending)	Administrative	\$400.00

b. Domestic Support Obligations assigned or owed to a governmental unit and paid less than full amount:  
Check one:

None

The allowed priority claims listed below are based on a domestic support obligation that has been assigned to or is owed to a governmental unit and will be paid less than the full amount of the claim pursuant to 11 U.S.C.1322(a)(4):

Creditor	Type of Priority	Claim Amount	Amount to be Paid
	Domestic Support Obligations assigned or owed to a governmental unit and paid less than full amount.		

**Part 4: Secured Claims**

**a. Curing Default and Maintaining Payments on Principal Residence:  NONE**

The Debtor will pay to the Trustee (as part of the Plan) allowed claims for arrearages on monthly obligations and the debtor shall pay directly to the creditor (outside the Plan) monthly obligations due after the bankruptcy filing as follows:

Creditor	Collateral or Type of Debt	Arrearage	Interest Rate on Arrearage	Amount to be Paid to Creditor (In Plan)	Regular Monthly Payment (Outside Plan)

**b. Curing and Maintaining Payments on Non-Principal Residence & other loans or rent arrears:  NONE**

The Debtor will pay to the Trustee (as part of the Plan) allowed claims for arrearages on monthly obligations and the debtor will pay directly to the creditor (outside the Plan) monthly obligations due after the bankruptcy filing as follows:

Creditor	Collateral or Type of Debt	Arrearage	Interest Rate on Arrearage	Amount to be Paid to Creditor (In Plan)	Regular Monthly Payment (Outside Plan)
Capital One Auto Finance (pre-petition) Capital One Auto Finance (post-petition)	2011 Ford Escape	\$963.55 (\$623.04 remaining) \$1,935.77 (\$1,052.25 remaining)	0% 0%	\$623.04 \$1,052.25	\$320.42

**c. Secured claims excluded from 11 U.S.C. 506:  NONE**

The following claims were either incurred within 910 days before the petition date and are secured by a purchase money security interest in a motor vehicle acquired for the personal use of the debtor(s), or incurred within one year of the petition date and secured by a purchase money security interest in any other thing of value:

Name of Creditor	Collateral	Interest Rate	Amount of Claim	Total to be Paid through the Plan Including Interest Calculation

**d. Requests for valuation of security, Cram-down, Strip Off & Interest Rate Adjustments  NONE**

1.) The debtor values collateral as indicated below. If the claim may be modified under Section 1322(b)(2), the secured creditor shall be paid the amount listed as the "Value of the Creditor Interest in Collateral," plus interest as stated. The portion of any allowed claim that exceeds that value shall be treated as an unsecured claim. If a secured claim is identified as having "NO VALUE" it shall be treated as an unsecured claim.

**NOTE: A modification under this Section ALSO REQUIRES  
the appropriate motion to be filed under Section 7 of the Plan.**

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Superior Liens	Value of Creditor Interest in Collateral	Annual Interest Rate	Total Amount to be Paid

2.) Where the Debtor retains collateral and completes the Plan, payment of the full amount of the allowed secured claim shall discharge the corresponding lien.

**e. Surrender  NONE**

Upon confirmation, the stay is terminated as to surrendered collateral only under 11 U.S.C. 362(a) and that the stay under 11 U.S.C 1301 be terminated in all respects. The Debtor surrenders the following collateral:

Creditor	Collateral to be Surrendered	Value of Surrendered Collateral	Remaining Unsecured Debt
Champion Mortgage	Residence	\$140,000.00	Unknown

**f. Secured Claims Unaffected by the Plan  NONE**

The following secured claims are unaffected by the Plan:

**g. Secured Claims to be Paid in Full Through the Plan:  NONE**

Creditor	Collateral	Total Amount to be Paid Through the Plan

**Part 5: Unsecured Claims  NONE**

**a. Not separately classified** allowed non-priority unsecured claims shall be paid:

- Not less than \$ \_\_\_\_\_ to be distributed *pro rata*
- Not less than \_\_\_\_\_ percent
- Pro Rata* distribution from any remaining funds

**b. Separately classified unsecured** claims shall be treated as follows:

Creditor	Basis for Separate Classification	Treatment	Amount to be Paid

**Part 6: Executory Contracts and Unexpired Leases  NONE**

(NOTE: See time limitations set forth in 11 U.S.C. 365(d)(4) that may prevent assumption of non-residential real property leases in this Plan.)

All executory contracts and unexpired leases, not previously rejected by operation of law, are rejected, except the following, which are assumed:

Creditor	Arrears to be Cured in Plan	Nature of Contract or Lease	Treatment by Debtor	Post-Petition Payment

**Part 7: Motions  NONE**

**NOTE: All plans containing motions must be served on all affected lienholders, together with local form, *Notice of Chapter 13 Plan Transmittal*, within the time and in the manner set forth in D.N.J. LBR 3015-1. A *Certification of Service, Notice of Chapter 13 Plan Transmittal, and valuation* must be filed with the Clerk of Court when the plan and transmittal notice are served.**

**a. Motion to Avoid Liens Under 11. U.S.C. Section 522(f).  NONE**

The Debtor moves to avoid the following liens that impair exemptions:

Creditor	Nature of Collateral	Type of Lien	Amount of Lien	Value of Collateral	Amount of Claimed Exemption	Sum of All Other Liens Against the Property	Amount of Lien to be Avoided

**b. Motion to Avoid Liens and Reclassify Claim from Secured to Completely Unsecured.  NONE**

The Debtor moves to reclassify the following claims as unsecured and to void liens on collateral consistent with Part 4 above:

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Superior Liens	Value of Creditor's Interest in Collateral	Total Amount of Lien to be Reclassified

**c. Motion to Partially Void Liens and Reclassify Underlying Claims as Partially Secured and Partially Unsecured.  NONE**

The Debtor moves to reclassify the following claims as partially secured and partially unsecured, and to void liens on collateral consistent with Part 4 above:

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Amount to be Deemed Secured	Amount to be Reclassified as Unsecured

**Part 8: Other Plan Provisions**

**a. Vesting of Property of the Estate**

- Upon confirmation
- Upon discharge

**b. Payment Notices**

Creditors and Lessors provided for in Parts 4, 6 or 7 may continue to mail customary notices or coupons to the Debtor notwithstanding the automatic stay.

**c. Order of Distribution**

The Standing Trustee shall pay allowed claims in the following order:

- 1) Ch. 13 Standing Trustee commissions
- 2) Administrative Expenses
- 3) Priority Claims
- 4) Unsecured Claims

**d. Post-Petition Claims**

The Standing Trustee  is,  is not authorized to pay post-petition claims filed pursuant to 11 U.S.C. Section 1305(a) in the amount filed by the post-petition claimant.

**Part 9: Modification  NONE**

**NOTE: Modification of a plan does not require that a separate motion be filed. A modified plan must be served in accordance with D.N.J. LBR 3015-2.**

If this Plan modifies a Plan previously filed in this case, complete the information below.

Date of Plan being modified: April 24, 2018.

Explain below **why** the plan is being modified:

Reflect amount due on vehicle pursuant to prior confirmed Plan.  
Remove any further arrears payments to Champion Mortgage due to Motion for Relief and pending Sheriff's Sale.

Explain below **how** the plan is being modified:

Part 1(a) - length of Plan changing due to removal of mortgage arrears.  
Part 3(2) - add pending Supplement Attorney Fee.  
Part 4(b) - add pre and post-petition arrears owed on vehicle.  
Part 4(e) - add surrender of residence.  
Part 4(f) - remove vehicle being unaffected by Plan.  
Part 4(g) - remove paying Champion Mortgage in full through Plan.

Are Schedules I and J being filed simultaneously with this Modified Plan?

Yes  No

**Part 10: Non-Standard Provision(s): Signatures Required**

Non-Standard Provisions Requiring Separate Signatures:

**NONE**

Explain here:

Any non-standard provisions placed elsewhere in this plan are ineffective.

**Signatures**

The Debtor(s) and the attorney for the Debtor(s), if any, must sign this Plan.

By signing and filing this document, the debtor(s), if not represented by an attorney, or the attorney for the debtor(s) certify that the wording and order of the provisions in this Chapter 13 Plan are identical to Local Form, *Chapter 13 Plan and Motions*, other than any non-standard provisions included in Part 10.

I certify under penalty of perjury that the above is true.

Date: December 1, 2021

/s/ Nancy M. Krimm  
Debtor

Date: \_\_\_\_\_

\_\_\_\_\_  
Joint Debtor

Date: December 1, 2021

/s/ Richard S. Hoffman, Jr.  
Attorney for Debtor(s)

In re:  
Nancy M. Krimm  
Debtor

Case No. 18-17590-ABA  
Chapter 13

District/off: 0312-1  
Date Rcvd: Dec 01, 2021

User: admin  
Form ID: pdf901

Page 1 of 3  
Total Noticed: 31

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
++	Addresses marked '++' were redirected to the recipient's preferred mailing address pursuant to 11 U.S.C. § 342(f)/Fed. R. Bank. P. 2002(g)(4).
##	Addresses marked '##' were identified by the USPS National Change of Address system as undeliverable. Notices will no longer be delivered by the USPS to these addresses; therefore, they have been bypassed. The debtor's attorney or pro se debtor was advised that the specified notice was undeliverable.

**Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Dec 03, 2021:**

Recip ID	Recipient Name and Address
db	+ Nancy M. Krimm, 601 E. Academy Street, Clayton, NJ 08312-1529
aty	+ D Todd Mathews, The Gori Law Firm, 156 Main Street, Edwardsville, IL 62025-1902
517478319	+ ATIRAcredit, TMG Financial Services, PO Box 14542, Des Moines, IA 50306-3542
517458014	ATIRAcredit Mastercard, PO Box 10415, Des Moines, IA 50306-0415
517458012	Ally Capital Corp., PO Box 380909, Minneapolis, MN 55438-0909
517458013	American Coradius Int'l, LLC, 2420 Sweet Home Road, Suite 150, Amherst, NY 14228-2244
517458016	+ Borough of Clayton, 125 N. Delsea Drive, Clayton, NJ 08312-1698
517458018	Champion Mortgage, PO Box 619093, Dallas, TX 75261-9093
517458020	Fulton Bank of NJ, PO Box 790408, Saint Louis, MO 63179-0408
517612374	+ NATIONSTAR MORTGAGE LLC, CHAMPION MORTGAGE COMPANY, 8950 Cypress Waters Blvd., Coppell TX 75019-4620
517458023	++ NATIONSTAR MORTGAGE LLC, PO BOX 619096, DALLAS TX 75261-9096 address filed with court; Nationstar Mortgage, LLC, PO Box 619096, Dallas, TX 75261-9741
517494412	+ Nationstar Mortgage, LLC, ROBERTSON, ANSCHUTZ & SCHNEID, P.L., 6409 Congress Ave, Suite # 100, Boca Raton FL 33487-2853
517458025	TMG Financial Services, 1600 NW 118th St, Des Moines, IA 50325

TOTAL: 13

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
smg	Email/Text: usanj.njbankr@usdoj.gov	Dec 01 2021 20:35:00	U.S. Attorney, 970 Broad St., Room 502, Rodino Federal Bldg., Newark, NJ 07102-2534
smg	+ Email/Text: ustpregion03.ne.ecf@usdoj.gov	Dec 01 2021 20:35:00	United States Trustee, Office of the United States Trustee, 1085 Raymond Blvd., One Newark Center, Suite 2100, Newark, NJ 07102-5235
cr	+ Email/PDF: acg.acg.ebn@aisinfo.com	Dec 01 2021 20:39:35	Capital One Auto Finance, a division of Capital One, 4515 N Santa Fe Ave. Dept. APS, Oklahoma City, OK 73118-7901
517472430	Email/Text: ally@ebn.phinsolutions.com	Dec 01 2021 20:35:00	Ally Capital, PO Box 130424, Roseville MN 55113-0004
517458015	Email/Text: bankruptcy@pepcoholdings.com	Dec 01 2021 20:35:00	Atlantic City Electric Company, Pepco Holdings, Inc., Bankruptcy Division, Mail Stop 84CP42, 5 Collins Drive, Suite 2133, Carneys Point, NJ 08069-3600
517458017	+ Email/PDF: acg.coaf.ebn@aisinfo.com	Dec 01 2021 20:39:41	Capital One Auto Finance, PO Box 259407, Plano, TX 75025-9407
517521031	+ Email/PDF: acg.acg.ebn@aisinfo.com	Dec 01 2021 20:39:40	Capital One Auto Finance, a division of Capital One, P.O. Box 4360, Houston, TX 77210-4360
517469764	+ Email/PDF: acg.acg.ebn@aisinfo.com	Dec 01 2021 20:39:35	Capital One Auto Finance, a division of Capital One, AIS Portfolio Services, LP, 4515 N Santa Fe Ave. Dept. APS, Oklahoma City, OK 73118-7901

District/off: 0312-1

User: admin

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Date Rcvd: Dec 01, 2021

Form ID: pdf901

Total Noticed: 31

517458019	Email/Text: BNC-ALLIANCE@QUANTUM3GROUP.COM	Dec 01 2021 20:35:00	Comenity - HSN, PO Box 183043, Columbus, OH 43218-3043
517458021	Email/Text: assetrecovery@jerseyshorefcu.org	Dec 01 2021 20:35:00	Jersey Shore FCU, 1434 New Road, Northfield, NJ 08225
517601944	Email/PDF: resurgentbknotifications@resurgent.com	Dec 01 2021 20:39:31	LVNV Funding, LLC its successors and assigns as, assignee of U.S. Bank, N.A., Resurgent Capital Services, PO Box 10587, Greenville, SC 29603-0587
517494412	+ Email/Text: RASEBN@raslg.com	Dec 01 2021 20:35:00	Nationstar Mortgage, LLC, ROBERTSON, ANSCHUTZ & SCHNEID, P.L., 6409 Congress Ave, Suite # 100, Boca Raton Fl. 33487-2853
517517453	Email/PDF: cbp@onemainfinancial.com	Dec 01 2021 20:39:40	ONEMAIN, P.O. BOX 3251, EVANSVILLE, IN 47731-3251
517458024	Email/PDF: cbp@onemainfinancial.com	Dec 01 2021 20:39:33	One Main Financial, Attn: Bankruptcy Department, PO Box 6042, Sioux Falls, SD 57117-6042
517564364	Email/PDF: PRA_BK2_CASE_UPDATE@portfoliorecovery.com	Dec 01 2021 20:39:41	Portfolio Recovery Associates, LLC, PO Box 41067, Norfolk, VA 23541
517564365	Email/PDF: PRA_BK2_CASE_UPDATE@portfoliorecovery.com	Dec 01 2021 20:39:29	Portfolio Recovery Associates, LLC, PO Box 41067, Norfolk, VA 23541, Portfolio Recovery Associates, LLC, PO Box 41067, Norfolk, VA 23541
517597684	Email/Text: bnc-quantum@quantum3group.com	Dec 01 2021 20:35:00	Quantum3 Group LLC as agent for, Comenity Capital Bank, PO Box 788, Kirkland, WA 98083-0788
517594793	+ Email/PDF: ebn_ais@aisinfo.com	Dec 01 2021 20:39:36	Verizon, by American InfoSource LP as agent, 4515 N Santa Fe Ave, Oklahoma City, OK 73118-7901
517458026	Email/Text: edinkel@vikingservice.com	Dec 01 2021 20:36:00	Viking Client Services, PO Box 59207, Minneapolis, MN 55459-0207

TOTAL: 19

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
cr	*+	Nationstar Mortgage LLC, Robertson, Anschutz & Schneid, P.L., 6409 Congress Ave.suite # 100, Boca Raton, FL 33487-2853
517458022	##+	KML Law Group, PC, 216 Haddon Avenue, Suite 406, Westmont, NJ 08108-2812

TOTAL: 0 Undeliverable, 1 Duplicate, 1 Out of date forwarding address

## NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Dec 03, 2021

Signature: /s/Joseph Speetjens

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on December 1, 2021 at the address(es) listed below:

Name	Email Address
Harold N. Kaplan	on behalf of Creditor Nationstar Mortgage LLC D/B/A Champion Mortgage Company hkaplan@rasnj.com informationathnk@aol.com
Isabel C. Balboa	ecfmail@standingtrustee.com summarymail@standingtrustee.com
Isabel C. Balboa	on behalf of Trustee Isabel C. Balboa ecfmail@standingtrustee.com summarymail@standingtrustee.com
Jason Brett Schwartz	on behalf of Creditor Capital One Auto Finance a division of Capital One, N.A. jschwartz@mesterschwartz.com
Justin Plean	on behalf of Creditor Nationstar Mortgage LLC D/B/A Champion Mortgage Company jplean@raslg.com bkyecf@rasflaw.com;ras@ecf.courtdrive.com
Laura M. Egerman	on behalf of Creditor Nationstar Mortgage LLC bkyecf@rasflaw.com bkyecf@rasflaw.com;legerman@rasnj.com
Rebecca Ann Solarz	on behalf of Creditor Nationstar HECM Acquisition Trust 2015-1 Wilmington Savings Fund Society, FSB, not individually, but solely as trustee rsolarz@kmllawgroup.com
Richard S. Hoffman, Jr.	on behalf of Debtor Nancy M. Krimm rshoffman@hoffmandimuzio.com lmcevoy@hoffmandimuzio.com;jslachetka@hoffmandimuzio.com;hoffmanrr81909@notify.bestcase.com
Sindi Mncina	on behalf of Creditor Nationstar Mortgage LLC D/B/A Champion Mortgage Company smncina@raslg.com
U.S. Trustee	USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 10